

Exhibit B

Declaration of Polyane Soares de Oliveira dos Santos

1. My name is Polyane Soares de Oliveira dos Santos. I am detained at Karnes County Residential Center (“Karnes”) with my daughter, Rhynara, who is ten years old. My A number is 200-022-852.
2. The ICE officials and GEO employees at Karnes punished me because I spoke out about the injustice of detaining women and children who are seeking asylum.
3. My daughter and I fled Brazil, our native country, to escape life-threatening violence. My boss, a former police officer, threatened my life because I knew he was smuggling goods. I told him I was leaving, and he said I knew too much. He said he would cut out my tongue. We struggled over his knife and he stabbed me and then raped me. I ran after that. If I hadn’t happened to have seen a passing car, I’d be dead. I am scared for my life. The Brazilian government will not protect me.
4. My daughter and I are seeking asylum in the United States. ICE has detained me at Karnes since I came to the United States last summer. I have no criminal record in my home country, and ICE has never said that I pose any danger to anyone. If I were released, I would live with my husband and two other children in Boston. I would attend all future immigration court hearings. There is no good reason for continuing to detain me and my daughter.

Conditions of Detention at Karnes

5. My daughter and I have been detained at Karnes for eight months. The conditions at Karnes are inhumane, and I can’t take it here much longer. The ICE officials and GEO employees at Karnes do not treat us women and children with respect and dignity. They do not provide basic needs for mothers and children.
6. For example, our children cannot eat properly. The food that ICE and GEO give us is disgusting. We have rice and beans nearly every day. The rice is watery mush, and the beans are hard and not cooked enough. The food is also too spicy for children to eat. Over

the eight months I have been here, I have seen children lose weight. My daughter does not like to eat the food, and she complains about it all the time. The only thing I can do is buy her snacks from the commissary, and beg her to eat the cafeteria food. I get really worried for my daughter's health because sometimes she refuses to eat because the food is too spicy or tasteless.

7. The medical care at Karnes is terrible. The GEO medical staff do everything possible to cut costs, which means we don't get proper treatment. I have a strange lump in my throat that I asked the GEO doctor to examine for months. It feels like something is stuck inside. He kept telling me that I was fine, and he prescribed me acid reflux medication, which makes no sense and has nothing to do with the lump in my throat. He finally took an x-ray, but refused to see me after that. He would waive me away if he saw me through the window. I kept returning to his office because I wanted a blood test to check my thyroid, but the doctor refused. I am really worried about my health because I have lost twenty pounds since I have been detained at Karnes. I still do not know what the x-ray showed, and I do not know the reason for the lump in my throat. Not knowing why this lump is still there has caused me a lot of worry and anxiety.
8. One of my roommates had a really bad toothache. They told her she needed a tooth pulled, but then, they pulled the wrong tooth. They pulled the correct tooth after that. She is still in so much pain.
9. The mental health care they offer here at Karnes is meaningless. They only offer a psychologist for show, and he does not actually provide care to any of the detainees. I hesitate to call it mental health care at all. I open my heart to him to explain what my daughter and I went through. The psychologist sits with his face in his hand looking bored. He has never offered me any useful advice for coping with my experiences. At the end he just says, "I don't have the power to release you." We already know that—we just need mental health treatment, which we don't get. In my eight months at Karnes, I have never gotten real counseling from a psychologist or a social worker. I am traumatized—I need counseling for my flashbacks and intense anxiety. My daughter, who has also suffered

trauma in our home country, has not gotten any real counseling to help her cope with her past experiences, or with her current detention.

10. The GEO officials try to trick everyone on the outside into believing that things here are better than they really are. When people from the government come to visit, GEO tries to make everything look perfect. They put toys out in the day rooms for the children, and stock the fridges that are outside the dorms with snacks for the children, such as milk, juice and fruit. But when the government visitors leave, everything changes. The fridge is nearly empty all day. Our children don't have the nutrition they need to be healthy and grow.
11. Most importantly, I am very upset that there are children, like my daughter, detained at Karnes. Karnes feels very much like prison. They conduct head counts three times a day, just like they would do at a prison. They punish us for offenses as trivial as "disrespecting" a guard, which is also like a prison. Children should not be locked up here. I only came to the United States because I believed it was a safe place that would protect my daughter from violence, and because I was desperate and scared for our lives. Instead, we are treated like prisoners.

Hunger Strike and Protest

12. In March, along with some of the other women at Karnes, I decided to go on hunger strike because I am desperate. ICE will not let me go. When my daughter had her hearing before an immigration judge, the judge has said he would release my daughter if ICE released me on bond. After the judge said that, ICE told me that they would let my husband pay a bond to get me out. My husband and my other children live in Boston. They tried to pay to get me and my daughter out, but the ICE official in Boston said I wasn't in the computer system. After that, an ICE official, Officer Fernandez, here told me not to try that again. He said that I won't be released.
13. Only the mothers are participating in the hunger strike. Our children are not on hunger strike. We do not bring our children to breakfast or dinner, but we feed them with food

from the commissary. I eat one small thing from the commissary every day. I don't feel like my health is in serious danger from the strike.

14. The goal of our hunger strike was to shed light on our bad treatment and get ICE to release the women and children at Karnes while a judge decides whether they should get asylum in the United States. There is no reason to keep us locked up here. People accused of crimes are released on their own promise to return to court. We haven't even committed a crime. The same rule should apply to us.
15. Our hunger strike was also religious in nature. We prayed to ask God to help us endure detention and to give us strength to go through with our strike. We deliberately held the first hunger strike during Holy Week, which ends in Easter.
16. The hunger strike began with a petition that was circulated before Holy Week. We wrote the petition in order to explain why we were holding a hunger strike. The petition helped us express our feelings and our goals. We planned to begin refusing meals on the morning of Holy Tuesday.
17. On Monday morning, we planned to deliver the petition to Johana De Leon from an advocacy organization called RAICES, which helps the women at Karnes with our asylum applications and to find attorneys for our asylum cases. I was supposed to deliver the petition, but I had a court appearance that morning. Another detainee, Delmy Pineda Cruz, delivered the petition to Johana instead.
18. I went to the videoconference room for my court appearance at 8:00 Monday morning. When I came back, I was crying really hard, because the judge had refused to set a bond for me so that my daughter and I could be released. I really thought I would be let go that day, and instead, I found myself back at Karnes, still waiting. My asylum case is not scheduled to be heard until May 1, which meant I had to spend another month in detention. As I was crying, a GEO guard called me to Room 613, which is an administrative office.

Interrogation by GEO Employees

19. In the room, there were two female GEO guards, one GEO supervisor, and one GEO employee in plain clothes. They accused me of leading the hunger strike. I felt intimidated by their questioning, but I told them that the strike was the equal responsibility of every mom here. They did not believe me. They persisted in questioning me, asking who put this idea into the mothers' heads, how long the strike would go on for, and whether we understood that a hunger strike would harm our bodies. I eventually got up the courage to ask to leave. Between this questioning and my court appearance earlier that morning, I felt very overwhelmed.
20. I am not sure how GEO learned about our strike. I think one of the moms may have told GEO everything on Monday morning.
21. After I left Room 613, they let me stay in my dorm room for about twenty minutes. Then a GEO guard came and told me I had to go to the medical area. The guard told me I needed to stay in the medical area for an investigation and that I needed to be protected from the other mothers. This made no sense to me, because I had been at Karnes for eight months, and I had never had any problems with any other moms detained there.
22. When I got to the medical area, they took away my ID. I was interrogated by GEO supervisors, including a tall, older African-American supervisor, and a social worker named Rebecca. They asked many questions about the hunger strike. Rebecca pushed me the hardest. She told me that I had to tell her who the leader of the strike was rather than take the blame for everyone. She repeatedly asked me: if I am not the leader of the strike, who is? She also told me I would be forced to stay in an isolation room until the end of the investigation. The GEO staff told me I would be locked up, I would talk about the strike, and I would be let go if I said who the leader was. They said if I told them who the leader was, I could get out. The questioning and threats went on for about twenty minutes. I felt incredibly scared. I was telling them the truth, but it wasn't what they wanted to hear. I think they were looking for an easy way to get someone to call off the strike.

Confinement to Isolation Room and Interrogation by ICE Officials

23. After the questioning, the GEO staff then put me in an isolation room in the medical area. I had heard about these rooms, because they are used to punish women who break the rules. I had never been punished before, or had any disciplinary problems. There are at least three of these rooms in the medical area.
24. I was very scared to be in this room alone, and they had no good reason for putting me there. The door locked from the outside. The room was a little bigger than ten feet by ten feet. The room had a bed, like in a hospital room, with a thin mattress. The toilet was completely exposed; there were no walls around it. If someone looked through the window while I was using the toilet, they could see me directly. There was a sink in the room, but no soap. There was no shower. There was no other furniture. There was no window, except for a big glass panel in the door.
25. The room was very cold and quiet. Everything was cold to the touch. The door blocked noise completely, so I could not hear what was happening outside. A camera watched me from the corner.
26. I felt terrified. It was extremely cold and I was all alone. I felt punished like a person who had committed a really bad crime. The GEO staff already have us locked up at Karnes—I wondered why they had locked me up inside this small room, and how long I would be here. They did not tell me how long I would be there, or why. I just sat there in shock, feeling very scared and not knowing what to do.
27. I worried that my daughter would be brought here with me and that she would suffer more. She has already been suffering for so much time. She hates it at Karnes and it is hard for her to understand why we should be detained at all. How could a ten-year-old understand why she was forced to sit in isolation with her mother, if she hasn't done anything wrong? My fear was more for my daughter than for me. It's not her fault that I went on strike.
28. I thought I would be in that room for three days because 72 hours in the isolation room is the usual punishment for someone who breaks the rules at Karnes. I know there was

another mom who got involved with one of the guards, and when the GEO supervisors found out, they put her in isolation for three days.

29. After an hour, some ICE officers showed up, including Officer Pacheco. They asked me lots of questions, and they were extremely intimidating, disrespectful, and condescending to me. They treated me like I was stupid and tried to bully me into backing down. They asked if I understood the problems I was causing and they said that I was a bad influence on the other mothers. I told them that I am not the leader, and each mother can speak for herself.
30. Officer Pacheco said to me, “you’re an adult woman,” and he told me it was irresponsible to go on hunger strike. He said that if I went on with the strike, ICE would take Rhynara away from me and put her in another detention center. After he said that, he leaned closer to me and tapped his index finger on his temple repeatedly, raising his voice and saying “do you know what I’m saying?” He said I would not be able to take care of my daughter if I went on hunger strike because I would lose my mind and my brain would shut down. The officers told me I needed to stop striking, to be a good influence, and tell the other moms to stop doing this. Officer Pacheco said to me that “a lot of things can happen,” and I needed to think about my daughter. A threat that vague made me feel really scared. The officers also asked if I thought Rhynara would be happy staying in this closed room with me, which scared me even more, because that was the main thing on my mind.
31. The officers were trying to intimidate me out of striking. I felt bullied. They questioned whether I was competent to take care of myself and my daughter. And they were using the only thing I have left in here—my daughter—to try to get me to stop speaking out.
32. The officers eventually left, and I was alone in the room again for a few minutes. Then Officer Torres, one of the ICE officers, came back and told me to come out because everyone was going to talk. I later learned that a group of strikers had come to the medical area and demanded that I be released. I also learned that some women had started their hunger strike early because I was locked up.

Group Meeting and Threats by ICE Officials

33. The ICE officers called all of the hunger strikers to room 705. The room was packed, and there were many hunger strikers there. There were ICE officials and GEO employees in the room, but only the ICE officials spoke.
34. The ICE officers asked why we were striking. We told them we were striking because we should all be released from Karnes. There is no difference between us and other women who have been released—there is no reason to keep us locked up. The ICE officers said that mothers had to be in good health and mentally sharp to care for their children. If not, other people would have to care for the children. The ICE officers said that if we did not stop the hunger strike, they would take away our children.
35. Lilian started to explain the purpose of the strike. She tried to describe a dream she had about God setting us all free from Karnes. She got very emotional speaking about the injustice of detaining mothers and children for no reason, and she started crying. The ICE officers tried to make her leave the meeting to go see the GEO psychologist. She refused. She told them that she knew what she was saying, and it's not crazy.
36. At this meeting, lots of women dropped out of the hunger strike because they were worried about losing their children. They believed that ICE would label them as crazy and send their children to another detention facility. Many women at Karnes made their way to the United States with no other family, no money, and no education. It would be completely devastating to have their children taken from them and put in another detention center, or, worse, sent back to the life-threatening violence they were trying to escape.
37. After the meeting, Officer Pacheco gave me my ID back and said I was free to go back to my dorm room.
38. Even after I was released from the isolation room, ICE officials and GEO employees kept trying to intimidate me and the other strikers into silence. They don't want us to draw attention to the absurdity of keeping us mothers and children locked up at Karnes.

Intimidation by ICE Officials and GEO Employees

39. Kenia Yakeline Galeano and Delmy Pineda Cruz were forced to stay behind and go to the medical area after the meeting in Room 705. We knew ICE was taking them into the locked isolation rooms because GEO guards came to take all of their things out of their dorm rooms. When the other strikers saw that Kenia and Delmy were locked up, more than thirty of them dropped out of the strike. We were all terrified that this is what they would do to us, too. We were also very worried about Kenia and Delmy and their children. The isolation rooms are very harsh, and Kenia's son is only two years old. Kenia and Delmy were locked away overnight. We didn't see them until the next morning.
40. I later spoke with Kenia and Delmy about how ICE and GEO officials had questioned us separately. They lied to all of us. For example, they told me that Kenia and Delmy had admitted to being leaders, but they had not. They questioned us like criminals. It makes me feel scared to be at the mercy of guards who tell lies and lock us away just to cover up a protest.
41. The GEO guards told us that if we didn't stop protesting, things would look bad for our immigration case. They said we would be deported. I believe them, because GEO and ICE work together so closely. Being deported is really scary to me, because it isn't as simple as being sent home. Being deported means being sent back to life-threatening violence that I was trying to escape with my daughter. I don't want my strike to put my daughter's life at risk.
42. The GEO supervisors didn't want me to use the computers to send email messages during Holy Week. Ordinarily, GEO allows us to use the computers in the library to send emails to family members, attorneys, and others, if we have email accounts. After they released me from the isolation room, however, the guards would not let me use the computer for several days. They would always say "not today." I couldn't use a computer until after we broke the fast on Holy Saturday. They were trying to keep me from sending messages about the strike.

43. The GEO guards watch me closely now. If we get into a group of four or more people, they come over to see what we're talking about. They try to eavesdrop. I feel like my privacy is constantly invaded here, just so ICE and GEO can make sure we don't speak out about the injustice of family detention.
44. Either ICE or GEO took my name off the "resident" count. We have counts every day at 7:30 in the morning, 4:00 in the afternoon, and 8:00 at night. On Holy Thursday, my name disappeared from the list. This really scared me. When women are transferred to other detention centers or deported, it sometimes happens in the middle of the night, which is chilling. We wake up to find that one of the women is just gone. When a woman's name comes off the list, it usually means that she is being deported or sent somewhere else. When my name came off the count list, I thought that would happen to me, too—I thought ICE would deport me or transfer me that night. I was very scared that night.
45. I requested my medical records for my immigration case a while ago, and recently, I received the records. The GEO psychologist claimed in my counseling notes that I said I am a leader of the strike. He claims that I cried over the strike, too. Neither of these things are true. He is also lying about my daughter, saying she eats food from the cafeteria. I am worried that he will share these lies with ICE officers to try to get me deported.
46. The GEO guards also videotaped us and our children a few times using handheld cameras. It felt very invasive. The guards stood just about six feet away from us and kept pointing the camera at us and our children. It made me feel humiliated and angry—the guards degrade us and disrespect us constantly. It made me worried about what I could say to my daughter and others while they were filming me. There was no good reason for them to videotape us like that. There are already security cameras everywhere.
47. The GEO guards said they were trying to film us to prove that there was no hunger strike. We tried to reason with the guards—we asked them why they were filming us and asked them to turn their cameras off. They would only say that filming us was "part of their job" and refuse to put the camera down. We asked if we could talk with their supervisors about it, and they said no.

48. We decided, if GEO was going to make us feel like prisoners and watch our every move, we would protest. We took sheets of printer paper and wrote “L-I-B-E-R-T-A-D” (to spell freedom in Spanish) and put one letter on each piece of paper. Then we held the papers up in order and chanted “libertad!” A helicopter passed overhead while we were doing this. The GEO guards then ordered us to go to our rooms. I think they were angry that we ruined their video that was supposed to show that there was no protest going on.
49. It was about 6:45 on the same evening when the guards ordered us to our rooms, but we are supposed to be allowed outside until 7:00. The sick children are allowed to come outside and play from 7:00–8:00, and then we are allowed back outside from 8:00–10:00. Another mom argued that it was not 7:00 yet. We didn’t want the GEO guards to be able to send us inside just for protesting. After about five minutes, Kenia said that we should go inside to allow the sick children to play. We went inside after five minutes.
50. When the time came for everyone to come back outside for recreation at 8:00, the GEO guards wouldn’t let anyone out of their rooms. Some other moms told me there were ICE officers outside. The GEO guards said they were keeping us inside for our security, but I don’t believe that. Everyone at Karnes was on lockdown because we had protested. I think they were trying to send a message that we should be compliant and stop standing up for ourselves.
51. The next day, a GEO employee who works in Room 613 tried to get me and other mothers to sign a document. The document said we had committed “insurrection” because we were waving the “L-I-B-E-R-T-A-D” papers waiting for a helicopter rescue. The claim that we were trying to escape is ridiculous. We were not chanting to that helicopter and did not even know that it would fly overhead at that time. We certainly were not looking for a helicopter to rescue us. This was a crazy story that GEO invented. We had eight sheets of printer paper—nothing visible from a helicopter—and we knew that we were on camera. Helicopters fly by Karnes all the time. It was obviously a coincidence.
52. The piece of paper that the GEO guard gave us also said that we had committed the offense of “insurrection.” This, too, is ridiculous. We were not trying to overthrow the authorities

at Karnes or threaten anybody. We only held up pieces of paper and chanted while we were being filmed against our will.

53. The female GEO employee who wanted us to sign the insurrection charge said we did something very dangerous. She said the helicopter might have shot at us because people in the United States don't like us. It doesn't make any sense that GEO or ICE would punish us if all they wanted was to keep us safe.
54. This helicopter incident seems like a joke to me, except that I'm going to get punished for it. The ICE officials or GEO employees who decided to charge us with insurrection are trying to send a message that we should not protest. They don't even care if the charges sound plausible. They only want an excuse to punish us for protesting. The woman said that my commissary privileges would be taken away, and something else would happen to me after the director decided.
55. More than a week later, a GEO supervisor called me into a meeting in which he told me that I was being punished because I refused to go to my dorm room immediately after the helicopter incident. He said that, the next day, I would attend a meeting to determine whether I was guilty or not guilty. He called other moms who held the "L-I-B-E-R-T-A-D" sign to his office and said the same thing. We haven't heard anything else about this, but we're all worried that we will be punished for protesting. It's really unfair to label our actions as "insurrection."
56. Some things have changed since the strike began. GEO has changed the kitchen and the food. They put curtains in the area where we eat. They used to give us one small plate of food. Now, for the people who are eating, they get larger plates, and they are allowed to take more food than before.
57. The doctors also finally did a blood test to see whether something is wrong with my thyroid. I have heard in the past that it is hard to get an appointment to see the results of medical testing. I hope I don't have trouble seeing my results when they come back.

58. The strike is still going on. We broke our strike on Holy Saturday to give ICE ten days to respond to our demands. They did not respond to our demands, so we started striking again on Tuesday, April 14, 2015. I am continuing the hunger strike to protest our continuing detention for no reason whatsoever.
59. Before we resumed our strike, GEO guards took jobs away from all the mothers who are on strike. I don't know whether ICE had anything to do with this, but GEO usually asks ICE for permission before they do anything. Women at Karnes have job assignments such as cleaning dishes. For these jobs, we earn three dollars per day. Even though it is very little money, we take the jobs because we need the money to buy food for our children.
60. The strikers were asked to go to room 613, where they asked why the strikers won't eat and warned that if they didn't eat that day, they'd never work again. The GEO guards reminded the strikers how much they need their jobs. The guards are right: there are women here whose families cannot send them money, and the little money they earn doesn't go far because items in the commissary are really expensive. Buying food from the commissary is important for the children. The food GEO gives us is cooked so poorly that our children refuse to eat it. Buying things from the commissary is the only way we can make sure they eat enough. Taking away the mothers' jobs is like forcing them to choose between speaking out and caring for their children.
61. GEO has made the food at the commissary more expensive. I think this is to make it harder on moms without jobs who are on hunger strike.
62. The GEO nurses call us to the medical area to weigh us every day. They tell us that we have to start eating, or else we will not be able to take care of our children. They say our children will be taken away if we keep striking. They also say they don't want to have to lock us up. I'm afraid that they will lock me up again if I keep up with the hunger strike.
63. There are only about fifteen or twenty strikers left out of the nearly eighty who signed the petition before Holy Week. The women who stopped striking have told me they are scared

about what ICE and GEO will do to them. They are especially scared of losing their children.

64. Last Friday, the director of ICE, Sarah Saldaña, was visiting Karnes. We handed her a petition that about twenty of the hunger strikers had signed. The petition asked for our release from Karnes. I am worried that the petition made everything worse.
65. This morning, a GEO guard ordered me and all the other women on hunger strike to go to Room 705. The GEO guard gave a paper and pen to each of us and ordered us to write a statement about why we were striking and for how long we would continue with our strike. We didn't have a choice. We each wrote a statement to ICE with our names and the date explaining why we are on hunger strike.
66. Half an hour or forty minutes later, two ICE supervisors, including the supervisor of all the other ICE officials, who is female, came into the room. There were more ICE officials there, including Torres, Pacheco, Fernandez, and others whose name I don't know. I started feeling really intimidated by all those officers. The highest ICE supervisor asked Fernandez to translate what she said (she was speaking in English).
67. Fernandez, one of the ICE officials, translated the female ICE supervisor as saying: you think that because you are participating in the hunger strike, we will let you go. We will not let you go. I know you handed a petition to Sarah Saldana, but that does not change the law. You have to finish your cases here, locked up. You are not responsible mothers. You need to start eating so that you can take care of your children. If you continue your hunger strike, they will take your children away. If you continue your hunger strike, they will deport you.
68. I am scared of the further actions that ICE and GEO might take to prevent me from hunger striking. Nevertheless, I will keep striking because ICE could release me and my son and with the stroke of a pen. We are only seeking asylum and we have not committed any crimes. Our children should not be in jail because they had to run for their lives.

I, Polyane Soares de Oliveira dos Santos, swear pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and recollection.

Polyane S. de Oliveira

Polyane Soares de Oliveira dos Santos

04/20/2015

Date